

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION**

TERESA ANN THOMPSON, Individually,
and as Special Administer/Personal
Representative of the Estate of WINFIELD
THOMPSON, SR., Deceased, and the
ESTATE OF WINFIELD THOMPSON,
MELISSA PROCHNOW and JAMIE
HELGESON, as Special
Administrator(s)/Personal
Representative(s) of the Estate of
Nicholas Helgeson, and the
ESTATE OF NICHOLAS HELGESON,

Plaintiffs,

v.

WILLIAM HARRIE and THE NILLES
LAW FIRM a/k/a NILLES, SELBO &
HARRIE, LTD., and NODAK
INSURANCE COMPANY (f/k/a
NODAK MUTUAL INSURANCE
COMPANY), and NODAK MUTUAL
GROUP, INC., a Mutual Holding
Company and N.I. HOLDINGS, INC.
(An Intermediate Stockholding Company),

Defendants.

Case No. 4:19-cv-04023-LLP

**NODAK DEFENDANTS'
RULE 12(C) MOTION TO DISMISS**

Defendants Nodak Insurance Company (f/k/a Nodak Mutual Insurance Company),
Nodak Mutual Group, Inc., and N.I. Holdings, Inc. (hereinafter collectively, "Nodak
Defendants"), through their undersigned attorneys, move to dismiss all claims asserted

against them in Plaintiffs' Amended Complaint (ECF No. 1) pursuant to Fed. R. Civ. P. 12(c). This motion is supported by the Nodak Defendants' Memorandum in Support of Rule 12(c) Motion to Dismiss dated October 31, 2019 and filed contemporaneously with this motion.

Based on the foregoing, the Nodak Defendants respectfully request an order dismissing all claims asserted against them pursuant to Fed. R. Civ. P. 12(c).

Date: October 31, 2019



Angela Beranek Brandt (#3091)
Patrick H. O'Neill Jr. (*pro hac vice*)
LARSON • KING, LLP
30 East Seventh Street, Ste. 2800
Saint Paul, MN 55101
(651) 312-6500 | Fax: (651) 312-6618
abrandt@larsonking.com
Attorneys for Nodak Defendants